

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
United States of America

v.

Shakhzod Yunusov,

Defendant.

Deferred Prosecution Agreement

20 Cr. 653 (RA)

TO: Shakhzod Yunusov

On December 3, 2020, a grand jury in Southern District of New York returned an Indictment, in which you are accused of committing an offense against the United States, to wit, conspiracy to operate an unlicensed money transmitting business, conspiracy to commit money laundering, and bank fraud, in violation of 18 U.S.C. §§ 371, 1344, 1956(h). However, after a thorough investigation it has been determined that the interest of the United States and your own interest will best be served by deferring prosecution in this District. Prosecution will be deferred during the term of your good behavior and satisfactory compliance with the terms of this agreement for the period of six months from the signing of this agreement. The terms and conditions constituting your good behavior and satisfactory compliance are as follows:

- (1) You shall refrain from violation of any law (federal, state and local). You shall immediately contact your U.S. Pretrial Services Officer if arrested or questioned by a law-enforcement officer.
- (2) You shall associate only with law-abiding persons.
- (3) You shall work regularly at a lawful occupation and/or regularly attend school and support your legal dependents, if any, to the best of your ability. When out of work or not attending school you shall notify your supervising U.S. Pretrial Services Officer at once. You shall consult him or her prior to job and school changes.
- (4) You shall not leave the Southern or Eastern Districts of New York or the Eastern District of Pennsylvania without permission of your supervising U.S. Pretrial Services Officer.
- (5) You shall notify your supervising U.S. Pretrial Services Officer immediately of any change in your place of residence.
- (6) You shall follow your supervising U.S. Pretrial Services Officer's instructions and advice.
- (7) You shall report to your supervising U.S. Pretrial Services Officer as directed.

As a further condition you hereby consent to disclosure, by any federal, state or local government agency, or by any medical or substance abuse treatment provider, to the U.S. Pretrial Services Officer supervising your case, of such medical and treatment records as may be requested

by the Pretrial Services Officer to evaluate deferral of prosecution in this case. You further agree that you will execute any additional consent forms that any such agency or provider may require to release such information.

Special conditions are as follows:

(1) You shall make the following payments toward restitution: (i) \$8,000 no later than 14 days from the signing of this agreement; and (ii) 20% of your gross income by fifteenth day of each month for the six months of your supervision. The Defendant shall make restitution payments by certified check, money order, or online. Instructions for online criminal debts payments are available on the Clerk of the Court's website at <https://nysd.uscourts.gov/payment-information#PaymentofCriminalDebt>. Checks and money orders shall be made payable to the "SDNY Clerk of the Court" and mailed or delivered to: United States Courthouse, 500 Pearl Street, New York, New York 10007 – Attention: Cashier, as required by Title 18, United States Code, Section 3611. The Defendant shall write his name and the docket number of this case on each check or money order. The Clerk of Court will disburse payments, *pro rata*, to the victims listed in the attached Schedule of Victims. All payments shall be joint and several with co-defendant Djonibek Rahmankulov.

The United States Attorney may at any time revoke or modify any condition of this provisional release or change the period of such supervision. The United States Attorney may discharge you from supervision at any time. The United States Attorney may at any time proceed with the prosecution for this offense should the United States Attorney, in his or her sole discretion, deem such action advisable.

If upon completion of your supervision a written report from your supervising U.S. Pretrial Services Officer is received to the effect that you have complied with all the rules, regulations and conditions and special conditions applicable to your deferred prosecution, no further prosecution will be instituted in this District for the above offense.

Dated: New York, New York
July 2, 2024

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: Cecilia Vogel
Cecilia Vogel
Thane Rehn
Assistant United States Attorneys
Tel.: 212-637-1084/2354

07.29.2012

The undersigned hereby consents to the foregoing and expressly waives any and all rights to a speedy trial pursuant to the Sixth Amendment to the United States Constitution, the Speedy Trial Act, 18 U.S.C. §§3161 et seq., and any other pertinent provisions, and consents to the adjournment of all pending proceedings in this case. The undersigned further waives the applicable statute of limitations with respect to any prosecution that is not time-barred on the date that this agreement is signed. It is the intent of this provision to toll the applicable statute of limitations during the pendency of the deferred prosecution.

Dated: New York, New York
July 2, 2024


Michael Mullen
Attorney for Defendant


Shakhzod Yunusov
Defendant

Pursuant to 18 U.S.C. §3161(h)(2), exclusion under the Speedy Trial Act of the period of time during which the prosecution of the defendant is deferred pursuant to this agreement is hereby approved.

Dated: New York, New York
July 2, 2024


Hon. Ronnie Abrams
United States District Judge

The undersigned hereby consents to the foregoing and will accept supervision of the above-named defendant on the conditions set forth herein.

Dated: New York, New York
July 2, 2024


Shawn Bostic
United States Pretrial Services Officer

07.29.2012

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 UNITED STATES OF AMERICA :
 :
 - v. - : SCHEDULE OF VICTIMS
 :
 SHAKHZOD YUNUSOV, :
 :
 Defendant. :
 :
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NAME	ADDRESS & PHONE NUMBER	AMOUNT OF RESTITUTION
Cape Cod Community College	2240 Iyannough Road West Barnstable, MA 02668 (774) 330-4300	\$129,547
May Supply Company	1775 Erickson Ave Harrisonburg, VA 22801 (540) 433-2611	\$113,000
Blue Ridge Mountain Electric Membership Corporation	875 Main St Young Harris, GA 30582 (800) 292-6456	\$83,540
Home Services Title	4060 Executive Drive Dayton, OH 45430 (937) 435-2580	\$200,000
Varitron	12 Executive Dr #2 Hudson, NH 03051 450-361-3592	\$153,900
Cornerstone Real Estate Title Company, Ltd.	825 S Main St North Canton, OH 44720 (330) 433-6800	\$171,200
United States Small Business Administration	SBA/DFC 721 19th Street, 3rd Floor Room 301 Denver, CO 82020	\$149,900